

1 NAEEM O BETZ, ALL RIGHTS RESERVED - U.C.C.1-207.7, U.C.C.1-207.4, U.C.C.1-308,
2 U.C.C.1-103.6, U.C.C.3-415, Natural Person IN FULL LIFE, SUI JURIS
3 IN PROPRIA PERSONA
4 4244 HILDRETH ST. SE.
5 WASHINGTON, DC, [20019-9998]
6 1-202-706-8063

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
2012 NOV 21 P 3:33
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BY [Signature] DEPUTY

7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE DISTRICT OF MARYLAND

9 NAEEM O BETZ, ALL RIGHTS RESERVED - U.C.C.1-207.7, U.C.C.1-207.4, U.C.C.1-308,
10 U.C.C.1-103.6, Natural Person IN FULL LIFE, SUI JURIS, IN PROPRIA PERSONA

11 Plaintiff, Claimant

12 VS.

CIVIL ACTION No.

13
14 AW 12 CV 3445

15 CEO-TIMOTHY FELDMAN / CEO-LEONARD PRUZANSKY
16 LTD FINANCIAL SERVICES, L.P.
17 7322 South West Freeway Suite 1600
18 Houston, Texas 77074-2053

COMPLAINT

19 Defendant, Respondent
20

21 PRELIMINARY STATEMENT

22 1. This is an action for damages brought from violations of the Fair Credit Reporting Act
23 (FCRA) Title15 U.S.C. §1681 *et seq.*

24 JURISDICTION

25 2. The jurisdiction of this Court is conferred by Title15 U.S.C. §1681p.
26

27 FACTUAL ALLEGATION

28 3. On AUGUST 3, 2012, Defendant initiated a soft pull of Plaintiff's credit report from
TRANSUNION without permissible purpose.

COUNT I

**VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), Title15 U.S.C.§1681
WILLFUL NON-COMPLIANCE BY DEFENDANT LTD FINANCIAL SERVICES, L.P.
(DEBT COLLECTOR)**

3. Plaintiff is a consumer within the meaning of the FCRA, Title15 U.S.C.§1681a(c).

4. LTD FINANCIAL SERVICES, L.P. (DEBT COLLECTOR), is a furnisher of information within the meaning of the FCRA, Title15 U.S.C. §1681s-2.

5. LTD FINANCIAL SERVICES, L.P. (DEBT COLLECTOR), willfully violated the FCRA.

Defendant's Violations include, but are not limited to, the following:

(a) LTD FINANCIAL SERVICES, L.P. (DEBT COLLECTOR), willfully violated Title15 U.S.C.§1681b(f) by obtaining Plaintiff's consumer report without a permissible purpose as defined by Title15 U.S.C. §1681b.

WHEREFORE, Plaintiff demands judgment for damages in the amount of \$1,000 a Month from the date of credit pull against consumer credit report.

LTD FINANCIAL SERVICES, L.P. (DEBT COLLECTOR), are liable for actual or statutory damages, and punitive damages, attorney's fees and costs, pursuant to Title15 U.S.C. §1681n.

COUNT II

**VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), Title15 U.S.C. §1681
NEGLIGENT NON-COMPLIANCE BY DEFENDANT LTD FINANCIAL SERVICES,
L.P. (DEBT COLLECTOR),**

6. Plaintiff is a consumer within the meaning of the FCRA, Title15 U.S.C. §1681a(c).

1 7. LTD FINANCIAL SERVICES, L.P. (DEBT COLLECTOR), is a furnisher of
2 information within the meaning of the FCRA, Title15 U.S.C.§1681s-2.

3 8. LTD FINANCIAL SERVICES, L.P. (DEBT COLLECTOR), negligently violated the
4 FCRA.

5 Defendant's violations include, but are not limited to, the following:

6 (a) LTD FINANCIAL SERVICES, L.P. (DEBT COLLECTOR) negligently violated 15
7 U.S.C. §1681b (f) by obtaining Plaintiff's consumer report without a permissible purpose as
8 defined by Title15 U.S.C. §1681b.

9 **WHEREFORE**, Plaintiff demands judgment for damages in the amount of \$1,000 Month
10 from the date of credit pull against consumer credit report, LTD FINANCIAL SERVICES, L.P.
11 (DEBT COLLECTOR) are liable for actual damages, and attorney's fees and costs, pursuant to
12 Title15 U.S.C. § 1681o.

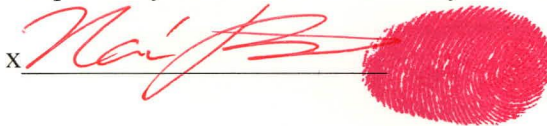
13 **RELIEF**

14 **WHEREFORE**, Plaintiff demands judgment for damages against, LTD FINANCIAL
15 SERVICES, L.P. (DEBT COLLECTOR) in the amount \$10,000 for actual or statutory damages,
16 and punitive damages, attorney's fees and costs, pursuant to Title 15 U.S.C.§1681n (a) (3) and
17 Title15 U.S.C. §1681o (a)

18 **DEMAND FOR JURY TRIAL**

19 Plaintiff hereby demands a trial by jury of all issues as a matter of law.

20 Respectfully submitted this 21th day of November, 2012

21 x 

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